

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CONVERGEN ENERGY LLC, L'ANSE WARDEN
ELECTRIC COMPANY, LLC, EUROENERGY
BIOGAS LATVIA LIMITED, and LIBRA CAPITAL
US, INC.

Plaintiffs,

-against-

STEVEN J. BROOKS, NIAN TICVISTA ENERGY
LLC, GREGORY MERLE, RIVERVIEW ENERGY
CORPORATION, DANIEL ESCANDON GARCIA,
RAMON URIARTE INCHAUSTI, CHIPPER
INVESTMENT SCR, SA, URINCHA SL, THEODORE
JOHN HANSEN, BRIAN R. MIKKELSON, and
CONVERGEN ENERGY WI, LLC,

Defendants.

Index No. 1:20-cv-03746 (LJL)

**DECLARATION OF DOV GOLD IN SUPPORT OF
MOTION FOR LEAVE TO AMEND THE COMPLAINT**

I, Dov Gold, declare as follows:

1. I am an attorney with the Seiden Law Group LLP and am counsel for Plaintiffs.
2. The General Objections of Defendants Steven Brooks, Nianticvista Energy, LLC, Gregory Merle, and Riverview Energy Corporation to Plaintiffs' First Request for Production is attached as **Exhibit A**.
3. Steven Brooks' employment agreement with Plaintiff Libra Capital US, Inc. dated January 7, 2014 is attached as **Exhibit B**.

Dated: New York, New York
September 9, 2020

/s/ Dov Gold
Dov Gold